

Young Conaway Stargatt & Taylor, LLP

Rockefeller Center
1270 Avenue of the Americas
Suite 2210
New York, NY 10020
Telephone: (212) 332-8840
Facsimile: (212) 332-8855
Matthew B. Lunn
Justin P. Duda

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,
v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,
v.

KEN-WEN FAMILY LIMITED PARTNERSHIP;
KENNETH W. BROWN, in his capacity as a
General Partner of the Ken-Wen Family Limited
Partnership; WENDY BROWN; and RBC
CENTURA BANK,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04468 (SMB)

CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above-captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures shall be due: January 18, 2016
2. Fact Discovery shall be completed by: May 5, 2017
3. The Disclosure of Case-in-Chief Experts shall be due: July 25, 2017
4. The Disclosure of Rebuttal Experts shall be due: August 24, 2017
5. The Deadline for Completion of Expert Discovery shall be: September 25, 2017
6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before October 2, 2017.
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before October 16, 2017.
8. The Deadline for Conclusion of Mediation shall be: On or before February 13, 2018.

If Plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities, LLC (the “Trustee”) files a motion for leave to amend the Complaint dated November 12, 2010 (the “Complaint”), all deadlines set forth herein will be stayed pending disposition of the motion. If the Trustee is permitted to file an amended complaint, to the extent necessary, the parties will negotiate an amended Case Management Order.

Dated: October 28, 2015

YOUNG CONAWAY STARGATT &
TAYLOR, LLP

By: /s/ Matthew B. Lunn

Matthew B. Lunn
Justin P. Duda
Rockefeller Center
1270 Avenue of the Americas, Suite 2210
New York, New York 10020
Telephone: (212) 332-8840
Facsimile: (212) 332-8855
Email: mlunn@ycst.com

*Attorneys for Plaintiff Irving H. Picard,
Trustee for the Liquidation of Bernard L.
Madoff Investment Securities LLC*